

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

In the Matter of the Petition of Dalia Genger, as
Trustee of The Orly Genger 1993 Trust Established
on Dec. 13, 1993 by Arie Genger, grantor.

Case No. 19-cv-9365-AKH

Dalia Genger, trustee of the Orly Genger 1993 Trust,

Hon. Alvin K. Hellerstein

Petitioner,

v.

Orly Genger, Arie Genger, Glenclova Investment
Company, TR Investors, LLC, New TR Equity I,
LLC, New TR Equity II, LLC, Trans-Resources,
Inc., Arnold Broser, David Broser, John Does 1-20,
and Jane Does 1-20,

Respondents.

NOTICE OF MOTION TO TRANSFER

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Motion to Transfer, dated October 22, 2019, Ron Satija, the Chapter 7 trustee appointed by the U.S. Bankruptcy Court for the Western District of Texas in Case No. 19-bk-10926-TMD in connection with the bankruptcy of petitioner Orly Genger, by and through his counsel, will move this Court, the United States District Court for the Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY 10007, at a time and date to be determined by the Court, for an Order transferring this proceeding to the Western District of Texas, pursuant to 28 U.S.C. § 1412.

Dated: New York, NY
October 22, 2019

KASOWITZ BENSON TORRES LLP

By: /s/ Michael Paul Bowen
Michael Paul Bowen
Andrew R. Kurland
1633 Broadway
New York, New York 10019
mbowen@kasowitz.com
Tel.: 212-506-1700
Fax: 212-506-1800
Counsel for Ron Satija, Chapter 7 Trustee

To (via FedEx overnight delivery):

Judith Bachman, Esq.
The Bachman Law Firm
365 S. Main Street, 2nd Floor
New City, NY 10956
Counsel for petitioner Dalia Genger

Adam Pollock
Pollock Cohen
60 Broad St. 24th floor
New York, NY 10004
Counsel for Michael Oldner

Gerald Greenberg, Esq.
Gelber Schachter & Greenberg
1221 Brickell Avenue, Suite 2010
Miami, FL 33131
Counsel for respondent Arie Genger

Chris Gartman, Esq.
1 Battery Park Plaza
New York, NY 10004
Counsel for respondents David Broser and Arnold Broser

Douglas D. Herrmann, Esq.
Pepper Hamilton LLP
1313 Market Street, Suite 5100
Wilmington, DE 19899
*Counsel for respondents Glenclova Investment Company,
TR Investors, LLC, New TR Equity I, LLC,
New TR Equity II, LLC, and Trans-Resources, LLC*